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Attorneys for Plaintiff Jeffrey I. Golden,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
JAMIE LYNN GALLIAN,
Debtor.

Case No. 8:21-bk-11710-SC
Chapter 7

JEFFREY I. GOLDEN, Chapter 7 Trustee,
Plaintiff,
vs.

Adv. No. 8:23-ap-01064-SC

**NOTICE OF ERRATA RE MOTION FOR
DEFAULT JUDGMENT UNDER LBR
7055-1 (J-PAD LLC)**

J-SANDCASTLE CO., LLC; J-PAD LLC;
STEVEN D. GALLIAN; BRIAN J.
GALLIAN; JUSTIN BARCLAY; RONALD
J. PIERPONT; ROBERT J. MCLELLAND;
AND E.J. GALLIAN,
Defendants.

Date: May 7, 2024
Time: 1:30 p.m.
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, California 92701

TO THE HONORABLE JUDGE SCOTT C. CLARKSON, DEFENDANTS, AND INTERESTED
PARTIES:

PLEASE TAKE NOTICE that on March 27, 2024, Jeffrey I. Golden, the Chapter 7 Trustee
for the bankruptcy estate of Jamie Lynn Gallian ("Plaintiff"), filed his Motion for Default
Judgment Under LBR 7055-1 against J-Pad LLC (the "Motion") (*docket no. 60*).

1 The Plaintiff unintentionally failed to attach a copy of the proposed default judgment to the
2 Motion. A copy of the proposed default judgment that Plaintiff will lodge and serve on J-Pad LLC
3 in connection with the Motion is attached as Exhibit A hereto.

4
5 DATED: April 4, 2024

DANNING, GILL, ISRAEL & KRASNOFF, LLP

6
7 By: /s/ Aaron E. de Leest

8 AARON DE LEEST

9 SHANTAL MALMED

10 Attorneys for Plaintiff Jeffrey I. Golden,
11 Chapter 7 Trustee
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EXHIBIT A

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GALLIAN; JUSTIN BARCLAY; RONALD
J. PIERPONT; ROBERT J. MCLELLAND;
AND E.J. GALLIAN,
Defendants.

Adv. No. 8:23-ap-01064-SC
**[PROPOSED] DEFAULT JUDGMENT
AGAINST J-PAD LLC**

Date: May 7, 2024
Time: 1:30 p.m.
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, California 92701

On May 7, 2024, the Court heard and considered the Plaintiff's Motion for Default Judgment under LBR 7055-1 against Defendant J-Pad LLC (the "Motion") filed by Plaintiff Jeffrey I. Golden, as the Chapter 7 Trustee (the "Trustee" or "Plaintiff") for the bankruptcy estate of Jamie Lynn Gallian (the "Debtor").

The Court having read and considered the Motion, having found that notice of the Motion was adequate and proper, having noted the lack of any response and that the Clerk of the Court entered the default of Defendant J-Pad LLC (“Defendant”) on August 22, 2023, and good cause appearing:

IT IS ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is granted.
2. Default judgment is entered in favor of the Plaintiff and against the Defendant on the Plaintiff’s first, fifth, eighth, ninth and tenth claims for relief in the Complaint.
3. The Debtor’s transfer of a lien on and security interest in the manufactured home located at 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649, Decal # LBM1081, Serial # AC7V710394GA, AC7V710394GB (the “Property”) to the Defendant reflected by the note and security agreement between J-Sandcastle Co., LLC and the Defendant dated November 16, 2018 and any liens on the Property in favor of the Defendant, are avoided and preserved for the benefit of the Debtor’s estate.
4. The transfers to the Defendant, including the following UCC Financing Statements (UCC-1) and UCC Financing Statement Amendments (UCC-3) and any liens on the Property in favor of the Defendant, are avoided and preserved for the benefit of the Debtor’s estate.

UCC Filing Date	UCC Type	Filing No.
1/14/2019	UCC-1 Financing Statement	197691916827
1/14/2019	UCC-1 Financing Statement	197691915674
1/14/2019	UCC-1 Financing Statement	197691905279
12/4/2020	UCC-3 Amendment	U200034803831
9/8/2021	UCC-3 Amendment	U210083394336
9/8/2021	UCC-3 Amendment	U210083400018
9/12/2021	UCC-3 Amendment	U210084251426
9/12/2021	UCC-3 Amendment	U210084255728
9/12/2021	UCC-3 Amendment	U210084256326
9/24/2021	UCC-3 Amendment	U210088103629

1 5. The Debtor's transfers to the Defendant reflected by the "Statement of Facts"
2 submitted to the California Department of Housing and Community Development on or about
3 August 6, 2021, stating that the legal owner of the Property was the Defendant and that the
4 Defendant perfected its lien on January 14, 2019, and the "Statement to Encumber" purportedly
5 signed on January 14, 2019, reflecting that the "legal owner" of the Property was the Defendant
6 and any liens on the Property in favor of the Defendant, are avoided and preserved for the benefit
7 of the Debtor's estate.

8 6. Judgment is entered in favor of the Plaintiff and against the Defendant in the sum of
9 \$225,000, plus interest.

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): NOTICE OF ERRATA RE MOTION FOR DEFAULT JUDGMENT UNDER LBR 7055-1 (J-PAD LLC) will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) April 4, 2024 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (*date*) April 4, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 4, 2024

Date

Beverly Lew

Printed Name

/s/ Beverly Lew

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)

- **Bradford Barnhardt** bbarnhardt@marshackhays.com,
bbarnhardt@ecf.courtdrive.com, alinares@ecf.courtdrive.com
- **Aaron E. DE Leest** adeleest@DanningGill.com,
danninggill@gmail.com; adeleest@ecf.inforuptcy.com
- **Robert P Goe** kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **Jeffrey I Golden (TR)** lwerner@go2.law,
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- **Shantal Malmed** smalmed@danninggill.com
- **Laila Masud** lmasud@marshackhays.com,
lmasud@ecf.courtdrive.com; lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov

2. SERVED BY U.S. MAIL

J-Pad LLC
Jamie Lynn Gallian, Managing Member
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

The Honorable Scott C. Clarkson
U.S. Bankruptcy Court
Ronald Reagan Federal Building
411 W. Fourth Street, Suite 5130
Santa Ana, CA 92701